



Co-Chairperson: Jim McKenna, Port of Portland  
Co-Chairperson: Bob Wyatt, NW Natural  
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November 3, 2006

Chip Humphrey  
Eric Blischke  
811 SW 6th Avenue, 3<sup>rd</sup> Floor  
Portland, OR 97204

Re: Transmittal of "A Review of Proposed TPH Sediment Quality Values and an Alternative Method to Define Hydrocarbon Values for Portland Harbor"

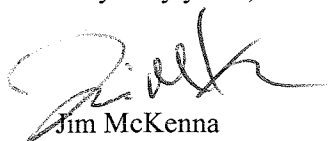
Dear Chip and Eric:

Attached please find a technical review of the sediment quality values (SQVs) for total petroleum hydrocarbons (TPH) proposed for use in RI/FS for the Portland Harbor NPL site, which was provided to the Lower Willamette Group (LWG) by three of its members, Chevron, Kinder Morgan and ConocoPhillips. At the request of EPA, the use of TPH values, defined as diesel range and residual range hydrocarbons, is being considered in the development of the predictive benthic toxicity model. There was some degree of statistical correlation found in the existing data between TPH level and toxicity, but incorporation of TPH mixtures in the predictive model is uncertain and not fully supported by the best available science on the toxicity of petroleum-based mixtures. The LWG, in response to EPA's request for transparency, is sharing the following information to provide background on this issue as we proceed to analyze it further in the Round 2 Report.

As requested by EPA, the Round 2 comprehensive data report will present the results of applying the current versions of the predictive benthic toxicity, including TPH. However, LWG will continue to examine the effect of covarying constituents and differential hydrocarbon compositions on the diesel-range and residual-range hydrocarbon SQVs, and will evaluate the performance of any resulting SQVs based on a subset of TPH relative to the performance of the diesel-range and residual-range SQVs currently in the predictive model.

LWG looks forward to meeting with EPA and its Partners to discuss the technical issues associated with developing SQVs for TPH following your review of the Round 2 comprehensive data report. In the meantime, if you have a questions or comments concerning this issue please contact either of us at your convenience.

Very truly yours,



Jim McKenna  
LWG Co-Chair



Bob Wyatt  
LWG Co-Chair



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